

CHRISTOPHER J. BOWES, ESQ.

54 Cobblestone Drive

Shoreham, NY 11786

Tel. (212) 979-7575

Fax (631) 929-1700

[cjbowes@gmail.com](mailto:cjbowes@gmail.com)

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 1/25/21

January 22, 2021

Via ECF

Hon Barbara C. Moses  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

# MEMO ENDORSED

Re: Johnson v. Saul  
20 Civ. 2630(BCM)

Dear Judge Moses:

I am writing to request an extension of time in which to file plaintiff's Motion for Judgment on the Pleadings in this case. Plaintiff's papers are due to be filed today. This is plaintiff's third request for an extension of time.

I am very sorry to request multiple extensions in this case. I have had an inordinately busy schedule this past month and have been addressing family obligations with regards to isolated family members. This morning, my son tested positive for the Coronavirus and my wife and I are scrambling to tend to his needs as well as get our two other children tested. As a result, I have not been able to do much of any work today and cannot complete what is needed in Mr. Johnson's case. In light of what I don't yet know about the course of my son's illness, I am seeking a one-week extension of time. With the kind consent of opposing counsel, Oona Peterson, Esq., I respectfully request that the Court approve the following revised schedule:

January 29, 2021	Plaintiff's Motion for Judgment on the Pleadings
March 30, 2021	Defendant's Motion for Judgment on the Pleadings
April 14, 2021	Plaintiff's Reply

Thank you for Your Honor's attention to this matter.

Very truly yours,

/s/ Christopher J. Bowes  
Christopher J. Bowes, Esq

Application GRANTED. The Court adopts the proposed revised schedule in its entirety. In the future, the Court requests that counsel realistically assess his ability to comply with existing deadlines the *first* time he requests an extension. The Court extends its best wishes to counsel's son for a speedy recovery. SO ORDERED.



Barbara Moses, U.S.M.J.  
January 25, 2021